



620 Eighth Avenue
New York, New York 10018
(212) 218-5500
fax (212) 218-5526
www.seyfarth.com

Writer's direct phone
(212) 218-5522

Writer's e-mail
eschrero@seyfarth.com

Writer's direct fax
(917) 344-1249

October 29, 2012

VIA E-MAIL AND ECF

United States District Judge Andrew L. Carter, Jr.
United States District Court
Southern District of New York
500 Pearl Street, Room 725
New York, NY 10007
ALCarterNYSDChambers@nysd.uscourts.gov

Re: ***G Investors Holding LLC v. Lincoln Benefit Life Company Inc.***
(USDC, SDNY, No. 09-cv-02980)

Dear Judge Carter:

This firm represents Lincoln Benefit Life Company Inc. ("Lincoln") in the above-referenced action. We write in furtherance of our two letters sent to Your Honor yesterday requesting a postponement of the commencement of the trial at bar, and to provide you with an update of the increasingly difficult circumstances we are facing.

Since we emailed Your Honor, we have learned that an integral member of our trial team, Jay Cho, has lost power in his home in New Jersey. Mr. Cho has been involved in this matter since its inception and is intimately familiar with the facts of the case. Moreover, he is responsible for managing Lincoln's exhibits and demonstrative aids at trial. He is an essential part of our trial team. Mr. Cho has two small children, ages 3 and 18 months, and the electric company has not advised as to when it may be restored. I have also recently lost power and have arranged for my associate, Sarah Izfar, to file this letter on my behalf. Under such unique and arduous circumstances, we ask the court to reschedule commencement of the trial to a mutually agreeable date.

Notwithstanding our respect for this Court, its calendar and opposing counsel, these extraordinary circumstances are beyond our control and that of our adversary. Assuming that Mr. Cho is available to participate, and our witnesses and client representatives can be here, we will be ready to proceed on Wednesday, November 7, 2012, as stated in our letters yesterday. As we also indicated yesterday, alternatively, the next day our witnesses are available for trial is December 10, 2012. However, given the unique situation and mindful of the Court's and our adversary's schedule, we will endeavor to make ourselves available on Monday, November 12, 2012 or any other Monday

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for the remainder of year with the exception of the weeks of Thanksgiving and Christmas, if that is more convenient for all parties.

We have endeavored to provide this Court and our adversary with as much notice as possible of our unique and changing circumstances. We respectfully await word from the Court and will be prepared to proceed as the Court directs. As of this writing, we are unsure whether the Court will reopen on Wednesday or whether jurors will be directed to appear. Nevertheless, should the Court be open, we are prepared to appear to make our application in person.

We thank the Court for its consideration of this matter and hope that everyone remains safe through the storm.

Very truly yours,

SEYFARTH SHAW LLP

/s/ Elizabeth D. Schrero

Elizabeth D. Schrero

cc: Dennis D'Antonio, Esq. (by email)
Derek M. Zisser, Esq. (by email)
Richard M. Resnik, Esq. (by email)
Jay W. Cho, Esq. (by email)